

**BOULT
CUMMINGS
CONNERS
& BERRY** PLC

Henry Walker

(615) 252-2363
Fax: (615) 252-6363
Email: hwalker@bccb.com

LAW OFFICES
414 UNION STREET, SUITE 1600
POST OFFICE BOX 198062
NASHVILLE, TENNESSEE 37219

March 10, 2000

REC'D TO
REGULATORY AUTH.
'00 MAR 10 PM 2 18
TELEPHONE (615) 244-2582
FACSIMILE (615) 252-2380
INTERNET Web-http://www.bccb.com/
EXECUTIVE SECRETARY

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

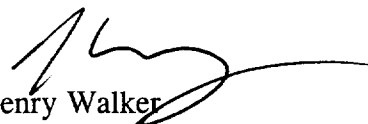
Re: Petition of U.S. LEC of Tennessee, Inc. To Enforce Interconnection
Agreements
Docket No. 99-00567

Dear David:

Please accept for filing the Issues List of US LEC in the above-captioned
proceeding.

Sincerely,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 
Henry Walker

HW/sw

cc: Guy Hicks, Counsel for BellSouth

POSTED
3-13-00

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

IN RE: US LEC PETITION TO ENFORCE INTERCONNECTION AGREEMENT
DOCKET NO. 99-00567

ISSUES LIST OF US LEC

As requested by the pre-hearing officer, US LEC of Tennessee, Inc. ("US LEC") submits the following, preliminary list of issues to be addressed in the above-captioned proceeding. This list will likely change as the parties conduct discovery and file testimony. Furthermore, the TRA's pending decision in a similar case brought by Hyperion (TRA Docket 98-00530) will likely also affect this issues list. US LEC reserves the right to amend this list accordingly.

1. Under the terms of the two interconnection agreements between BellSouth and US LEC, does BellSouth owe US LEC reciprocal compensation for terminating local calls made to Internet Service Providers ("ISPs")?
2. Based on the TRA's prior rulings in similar cases, the FCC's decisions on the issue of ISP traffic, and the pleadings of US LEC and BellSouth, is US LEC entitled to summary judgment?

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC


By: 

Henry Walker
414 Union Street, Suite 1600
P.O. Box 198062
Nashville, Tennessee 37219
(615) 252-2363

CERTIFICATE OF SERVICE

I, Henry Walker, hereby certify that I have served a copy of the foregoing Issues List to the following on this 7 day of March, 2000

Guy M. Hicks, Esq.
BellSouth Telecommunications, Inc.
Suite 2101
333 Commerce Street
Nashville, Tennessee 37201-3300



Henry Walker